

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB  
MDL No. 2323

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*

Civil Action No. 2:14-cv-00029-AB

Plaintiffs,

v.

National Football League and  
NFL Properties, LLC,  
successor-in-interest to  
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

FANCA OBJECTORS' PETITION FOR AN AWARD OF  
ATTORNEYS' FEES AND EXPENSES



MOLOLAMKEN  
LLP

HANGLEY  
ARONCHICK  
SEGAL  
& PUDLIN

# NFL Europe

**Revised Settlement**  
*June 25, 2014*

Faneca Objection

**Final Settlement**  
*April 22, 2015*

- No BAP for NFL-Europe-Only Players
- No “eligible season” credit
- 2,300 players added to BAP: **\$13.2 million**
- Partial “eligible season” credit: **\$23.6 million**

**Value: \$36.8 million**

# Modification of the BAP

**Revised Settlement**  
*June 25, 2014*

Faneca Objection

**Final Settlement**  
*April 22, 2015*

- Cap of \$75 million
- No Cap: BAP Exam for all eligible class members
- Full value of supplemental benefits

Value: **\$29.6 million**

# Waiver of Appeal Fee

**Revised Settlement**  
*June 25, 2014*

Faneca Objection



**Final Settlement**  
*April 22, 2015*

- \$1,000 fee – all cases
- Financial hardship waiver

Value: **\$11.6 million**

# Death with CTE

**Revised Settlement**  
*June 25, 2014*

Faneca Objection

**Final Settlement**  
*April 22, 2015*

- Limited to deaths before **preliminary** approval
- Extended to deaths before **final** approval
- 111 additional class members eligible

Value: **\$44.6 million**

# Faneca Objectors' Efforts To Cure Defects

1/6/2014	Class Counsel submit initial settlement for preliminary approval
5/5/2014	Faneca Objectors move to intervene
5/19/2014	Class Counsel oppose motion to intervene
6/25/2014	Class Counsel submit revised settlement for preliminary approval
7/2/2014	Faneca Objectors oppose preliminary approval
7/21/2014	Faneca Objectors file Rule 23(f) petition in Third Circuit
7/29/2014	Class Counsel file opposition to petition
10/6/2014	Faneca Objectors file objection to revised settlement (8 days early)
11/12/2014	Class Counsel file motion for final approval (response to objections)
11/19/2014	Fairness Hearing
12/2/2014	Faneca Objectors file post-hearing brief
12/16/2014	Class Counsel file reply in support of settlement